

EXHIBIT B

Plaintiff owns a judgment against Defendants Clyde Bergemann US, Inc., and Clyde Bergemann Power Group Americas, Inc., now known as Clyde Bergemann Power Group Americas, LLC, that was rendered on or about July 22, 2021, by the United States District Court for the Southern District of Texas in Civil Action No. 4-21-cv-02034. The amount on this judgment


is \$1,066,710.45 for breach of warranty; \$360,498.32 for legal fees, expenses, and expert fees; \$200,016.83 for costs of arbitration; and \$158,399.16 in pre-award interest, with simple interest accruing on the foregoing amounts at the rate of five (5) percent per annum from March 28, 2021, until paid. The judgment is valid and subsisting, and a supersedeas bond has not been approved and filed to suspend execution of the Judgment.

Within my knowledge, Defendants do not possess property in Texas subject to execution sufficient to satisfy the judgment. My knowledge is based on a diligent search of the asset and property records of the Defendants in the Westlaw database, and the Defendants' discovery responses. This garnishment is not sought to injure Defendants or Garnishee.

I have reason to believe and do believe that Garnishee has property belonging to the Defendants or is indebted to the Defendants. This belief is based on Plaintiff's due diligence and the Defendants' discovery responses.


Joni M. Fraser, Affiant

SIGNED under oath before me on this 12th day of January 2022.


Notary Public, State of Texas

